

The Honorable James Robart

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

DWIGHT HOLLAND

Plaintiff,

vs.

KING COUNTY ADULT DETENTION, KING
COUNTY et al., KING COUNTY DISTRICT
COURT EAST DIVISION – REDMOND
COURTHOUSE, et al., WASHINGTON STATE
DEPARTMENT OF LICENSING et al.,
WASHINGTON STATE PATROL et al.,
OFFICER WSP ANTHONY BROCK in his
individual and official capacity as Washington
State Patrol Officer, LAKEYSHA NICOLE
WASHINGTON in her individual and official
capacity as Prosecuting Attorney, KING COUNTY
PROSECUTING ATTORNEY'S OFFICE, et al.,
GRAY WESTSIDE TOWING LLC,

Defendant(s).

No. 12-cv-0791 JLR

**DECLARATION OF GERRIE
LAQUEY**

Gerrie LaQuey declares as follows:

1. I have personal knowledge of the facts contained herein and am competent to testify thereto.
2. I am a Records Manager with the King County Department of Public Health.


DECLARATION OF GERRIE LAQUEY - 1

Daniel T. Satterberg, Prosecuting Attorney
CIVIL DIVISION, Tort Section
900 King County Administration Building
500 Fourth Avenue
Seattle, Washington 98104
(206) 296-8820 Fax (206) 296-8819

4. Attached hereto as Exhibit 1 are true and correct copies of medical records from Jail Health Services pertaining to the medical care of Dwight M. Holland during his September 16, 2011 incarceration. Mr. Holland's date of birth has been redacted pursuant to court rule.

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct to the best of my knowledge.

Dated this 31 day of July, 2013 at Seattle, Washington


Gerrie LaQuey

Daniel T. Satterberg, Prosecuting Attorney
CIVIL DIVISION, Tort Section
900 King County Administration Building
500 Fourth Avenue
Seattle, Washington 98104
(206) 296-8820 Fax (206) 296-8819

Exhibit 1

Declaration of LaQuey

RECEIVING SCREENING FORM

DATE: 09/16/2011 04:28					
PATIENT NAME: HOLLAND, DWIGHT M					
AGE: 49					
VITAL SIGNS:					
MOST RECENT: 9/16/2011					
BP: 163 / 107 (Sitting)	Pulse: 96 (Sitting)	Temperature: 98.7 (Left Ear)	Respiration: 16 / min	SO2: 99 %	
PRIOR:					
BP:	Pulse:	Temperature:	Respiration:	SO2: 99 %	
ALLERGIES: NO KNOWN ALLERGIES					

ENCOUNTER DATE/TIME: SEEN @ 0410

ENHANCED RSF INTAKE ASSESSMENT

DAJD Deferral Screening Reviewed
Initial Observation

No Observed Medical Problems

Medical History

Hypertension

Other (please describe)

Mental Health Screening

Psychiatric Treatment in Past 3 Months

No

Currently Enrolled in Psychiatric Treatment

No

Taking Psychiatric Medications in Past 45 Days

No

Other Mental Health Concerns (reminder for Psych Provider Chart Review)

None

Prior Suicide Housing or Psychiatric Housing Admit

None

Prior Suicide Attempt

No

Suicidal Ideation

No

Rule Out Active Tuberculosis

No Indications for PPD

Rule Out Risk for Detox

No Stated Drug or Alcohol Problems

Dental Problems

No Stated Dental Problems

Medications

Uses Prescription Medication (please list)

Meds Verified

Public Health
Seattle & King County

Jail Health Services
500 5th Avenue
Seattle, WA 98104
Ph: 206.296.1091
FAX: 206.296.1771

620 W James St
Kent, WA 98032
Ph: 206.205.2410
FAX: 206.205-2439

PATIENT NAME: HOLLAND, DWIGHT M
BA #: 211028790
CCN: 1897785
BOOKING DATE: 9/16/2011 02:58AM
LOCATION: KCCF - 4-03-BK

HRN: 000041256
DOB: [REDACTED]
SEX: male

New/Revised -Receiving Screening Form- Form # (Aug 2006) (Rev.)

RECEIVING SCREENING FORM

Housing Recommendation
Medical (complete 571)

S	HO SLEEP APNEA AND HTN. SAYS HE HAS DIABETES BUT, PER GROUP HEALTH, NO DX, ONLY GLUCOSE INTOLERANCE. USES CPAP SET AT 13.
O	OBESSE, 49 YO, AA, MALE, COOP. BG=97. BP ELEVATED, ASYMPTOMATIC. T/C TO GROUP HEALTH - 7/30 RANITADINE 150MG QHS #60; 7/30 OMEPRAZOLE 20MG QAM #30; 6/7 METOPOROL 50MG ½ TAB BID #30.
A	SLEEP APNEA; HTN; GERD.
P	<p>TRANSFER TO MED FLOOR. WEDGE ORDERED. REFER TO MED PROVIDER FOR MEDS TO FILL. VS CHECK BIW X 14 DAYS.</p> <p>Procedures Ordered: INTAKE ASSESSMENT - RN: enhanced rsf intake assessment VITAL SIGNS - BIW X2 WEEKS: enhanced rsf intake assessment EQUIPMENT - BED WEDGE: enhanced rsf intake assessment</p> <p>New Reminders Added: MEDICAL PROVIDER - MEDS TO FILL Due on 09/16/2011 04:44(HTN).</p>

RN Name: LARSEN, COLLEEN R.N.

Electronically Signed by LARSEN, COLLEEN R.N. on 09/16/2011.
##And No Others##

NURSING PROGRESS NOTE

DATE: 09/16/2011 11:33				
PATIENT NAME: HOLLAND, DWIGHT M				
VITAL SIGNS:				
MOST RECENT: 9/16/2011				
BP: 163 / 107 (Sitting)	Pulse: 96 (Sitting)	Temperature: 98.7 (Left Ear)	Respiration: 16 / min	SO2: 99 %
PRIOR:				
BP:	Pulse:	Temperature:	Respiration:	SO2:
MEDICATIONS:				
ALLERGIES: NO KNOWN ALLERGIES				

ENCOUNTER DATE/TIME: 9/16/2011 1100


Reminder in place to give pt wedge
 Reviewed chart, no outside records with DX Sleep Apnea
 Saw pt on deck to sign ROI for outside record DX sleep apnea and study
 Pt not able to name provider, unable to obtain records
 Pt states sign paperwork and should be released today from jail
 Pt instructed if not get OOJ, need to call family or friends and get name of provider for records for Sleep Apnea
 Pt agree with plan
 Kite PRN

Procedures Ordered:

NURSE - TRIAGE (NO KITE): nursing services

Nurse's Name: DENSMORE, SUSAN R.N.

Electronically Signed by DENSMORE, SUSAN R.N. on 09/16/2011.
 ##And No Others##

Public Health Seattle & King County		Jail Health Services 500 5 th Avenue Seattle, WA 98104 Ph: 206.296.1091 FAX: 206.296.1771		620 W James St Kent, WA 98032 Ph: 206.205.2410 FAX: 206.205-2439	
		PATIENT NAME: HOLLAND, DWIGHT M BA #: 211028790 CCN: 1897785 BOOKING DATE: 9/16/2011 02:58AM LOCATION: KCCF - 7SLC05			
New/Revised - Nursing Progress Note - Form # (Aug 2006.) (Rev. mo. - yr.)				HRN: 000041256 DOB: [REDACTED] SEX: male	

MEDICAL PROVIDER REVIEW NOTE

DATE: 09/16/2011 11:48							
PATIENT NAME: HOLLAND, DWIGHT M							
VITAL SIGNS:							
MOST RECENT: 9/16/2011							
BP:	163 / 107 (Sitting)	Pulse:	96 (Sitting)	Temperature:	98.7 (Left Ear)	Respiration: 16 / min	SO2: 99 %
PRIOR:							
BP:		Pulse:		Temperature:		Respiration:	SO2:
Current Height:				Current Weight:			
MEDICATIONS:							
ALLERGIES:		NO KNOWN ALLERGIES					

- ☒ Internal medical record review
☐ External / outside medical record review
☐ Laboratory review
☐ Other review

Provider Review Information:

Med to fill reminder set for IM with BP 164/107 on no current BP med OOJ.
 VS biw x 2 wks ordered appropriately.

Assessment and Plan:

No action indicated. Wait for BP average to determine disposition.

Procedures Ordered:

MEDICAL PROVIDER REVIEW - LEVEL 1: enhanced rsf intake assessment

Provider Name: HIGGS, ROGER M.D.

Electronically Signed by HIGGS, ROGER M.D. on 09/16/2011.
 ##And No Others##

Public Health Seattle & King County	Jail Health Services 500 5 th Avenue Seattle, WA 98104 Ph: 206.296.1091 FAX: 206.296.1771		620 W James St Kent, WA 98032 Ph: 206.205.2410 FAX: 206.205-2439	
	PATIENT NAME: HOLLAND, DWIGHT M BA #: 211028790 CCN: 1897785 BOOKING DATE: 9/16/2011 02:58AM LOCATION: KCCF - 7SLC05			
		HRN: 000041256 DOB: [REDACTED] SEX: male		

CLINICAL DATA EXTRACT – RELEASE OF INFORMATION

EXTRACT DATE: 12/11/2012 08:05

CORRESPONDING AUTHORIZATION FORM SCAN DATE:

A Release of Information (ROI) was processed for this patient. The requested medical records were copied and forwarded to the Public Health Compliance Office for review, redaction and processing. Detailed below is information regarding the requestor of this ROI:

Requestor's Name: Terry M., Risk Mgr.
 Agency: PH BSA Office
 Phone: 206 263-8255
 ROI Scan Date: 12/10/12

Fulfilled By: FORTSON, ALFREDA

DATABASE EXTRACT: All data shown below the line is a direct automated extract of the clinical information contained within the electronic health record of the patient. This data has not been altered in the creation of this note. However the information contained below is subject to redaction by the Public Health to conform to the request.

DEMOGRAPHICS:

PATIENT NAME: HOLLAND, DWIGHT M HRN: 000041256 DOB: [REDACTED] SEX: male

PROBLEM LIST:

ACTIVE PROBLEMS:	Enhanced Rsf Intake Assessment First Observed 9/16/2011 04:29AM
INACTIVE PROBLEMS:	

ALLERGY LIST:

ALLERGIES:	NO KNOWN ALLERGIES
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MEDICATION LIST:

MEDICATIONS ORDERED DURING LAST ADMISSION:	<i>NOTE: Medications listed here only if patient is no longer admitted.</i>
ACTIVE MEDICATIONS:	<i>NOTE: Medications listed here only if patient is currently a JHS patient.</i>

Public Health Seattle & King County <small>New/Revised - Clinical Data Summary - Rol- Form # (Dec 2009) (Rev. mo. - yr.)</small>	Jail Health Services 500 5 th Avenue Seattle, WA 98104 Ph: 206.296.1091 FAX: 206.296.1771 620 W James St Kent, WA 98032 Ph: 206.205.2410 FAX: 206.205-2439	PATIENT NAME: HOLLAND, DWIGHT M BA #: 211028790 CCN: 1897785 BOOKING DATE: 9/16/2011 02:58AM LOCATION: KCCF - 4-03-REL HRN: 000041256 DOB: [REDACTED] SEX: male
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CLINICAL DATA EXTRACT – RELEASE OF INFORMATION

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VITAL SIGNS HISTORY:

Date/Time	Entered By	BP	Pulse	Rhythm	Resp	Temp	Oxygen	Height	Weight
9/16/2011 04:27AM		163 / 107 Standing	96 Standing		16	98.7 L. EAR	0.00 L/Min		

CLINICAL DATA EXTRACT - AUTHENTICATION:

This document is finished and has been entered into the patient's chart.

Public Health
Seattle & King County



Jail Health Services
500 5th Avenue
Seattle, WA 98104
Ph: 206.296.1091
FAX: 206.296.1771

620 W James St
Kent, WA 98032
Ph: 206.205.2410
FAX: 206.205-2439

PATIENT NAME: HOLLAND, DWIGHT M
BA #: 211028790
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BOOKING DATE: 9/16/2011 02:58AM
LOCATION: KCCF - 4-03-REL

HRN: 000041256
DOB: [REDACTED]
SEX: male

New/Revised – Clinical Data Summary – RoI – Form # (Dec 2009)) (Rev. mo. – yr.)

KING COUNTY JAIL HEALTH SVCS

KCCF

PHYSICIANS DAILY ORDERS

Admitting MD: SANDERS, BENJAMIN L

Attending MD: SANDERS, BENJAMIN L

Referring MD:

PATIENT NAME: HOLLAND, DWIGHT M

MRN :000041256

AGE: 49

Sex :M

- ENCOUNTER ORDERS -

Ordering MD: HIGGS, ROGER Patient : HOLLAND, DWIGHT M MRN :000041256

Entry Date/Time: SEP-16-2011 11:55:31

Entry User : (47781)HIGGS,ROGER M.D.

Procedure Date/Time : SEP-16-2011 11:55:00

Procedure Type : Provider

Description : MEDICAL PROVIDER REVIEW - LEVEL 1

Procedure Comment :

Diagnoses : ENHANCED RSF INTAKE ASSESSMENT

Order No:9606621-1

*** Electronically Signed by HIGGS, ROGER on SEP-20-2011:130855.***

And No Others ##
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--- ENCOUNTER ORDERS ---

KING COUNTY JAIL HEALTH SRVCS

KCCF

PHYSICIANS DAILY ORDERS

Admitting MD: SANDERS, BENJAMIN L

Attending MD: SANDERS, BENJAMIN L

Referring MD:

PATIENT NAME: HOLLAND, DWIGHT M

MRN :000041256

AGE: 49

Sex :M

- ENCOUNTER ORDERS -

Ordering MD: SANDERS, BENJAMIN L Patient : HOLLAND, DWIGHT M MRN :000041256

Entry Date/Time: SEP-16-2011 11:36:14

Entry User : (45601)DENSMORE,SUSAN R.N.

Procedure Date/Time : SEP-16-2011 11:35:00

Procedure Type : RN Proc

Description : NURSE - TRIAGE (NO KITE)

Procedure Comment :

Diagnoses : NURSING SERVICES

Order No:9606598-1

*** Electronically Signed by SANDERS, BENJAMIN L on SEP-16-2011:145413.***

And No Others

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--- ENCOUNTER ORDERS ---

KING COUNTY JAIL HEALTH SVCS

KCCF

PHYSICIANS DAILY ORDERS

Admitting MD: SANDERS, BENJAMIN L
 Attending MD: SANDERS, BENJAMIN L
 Referring MD:
 PATIENT NAME: HOLLAND, DWIGHT M

MRN :000041256

AGE: 49 Sex :M

- ENCOUNTER ORDERS -

Ordering MD: SCHROEDER, CATHERINE Patient : HOLLAND, DWIGHT M MRN
 :000041256
 Entry Date/Time: SEP-16-2011 04:46:17
 Entry User : (45413)LARSEN, COLLEEN R.N.

Procedure Date/Time : SEP-16-2011 04:45:00
 Procedure Type : RN Proc
 Description : INTAKE ASSESSMENT - RN
 Procedure Comment :
 Diagnoses : ENHANCED RSF INTAKE ASSESSMENT
 Order No:9606265-1

*** Electronically Signed by SCHROEDER, CATHERINE on SEP-19-2011:065916.***
 ## And No Others ##

Ordering MD: SCHROEDER, CATHERINE Patient : HOLLAND, DWIGHT M MRN
 :000041256
 Entry Date/Time: SEP-16-2011 04:46:17
 Entry User : (45413)LARSEN, COLLEEN R.N.

Procedure Date/Time : SEP-16-2011 04:45:00
 Procedure Type : RN Proc
 Description : VITAL SIGNS - BIW X2 WEEKS
 Procedure Comment :
 Diagnoses : ENHANCED RSF INTAKE ASSESSMENT
 Order No:9606265-2

*** Electronically Signed by SCHROEDER, CATHERINE on SEP-19-2011:065916.***
 ## And No Others ##

Ordering MD: SCHROEDER, CATHERINE Patient : HOLLAND, DWIGHT M MRN
 :000041256
 Entry Date/Time: SEP-16-2011 04:46:17
 Entry User : (45413)LARSEN, COLLEEN R.N.

Procedure Date/Time : SEP-16-2011 04:45:00
 Procedure Type : RN Proc
 Description : EQUIPMENT - BED WEDGE
 Procedure Comment :
 Diagnoses : ENHANCED RSF INTAKE ASSESSMENT
 Order No:9606265-3

*** Electronically Signed by SCHROEDER, CATHERINE on SEP-19-2011:065916.***
 ## And No Others ##

--- ENCOUNTER ORDERS ---

MEDICAL ALERT

Date 7-16-11
Name Holland, Dwight
BA # 211028790
Location 27
DOB [REDACTED]

Bleeding Risk ☐
Breathing Condition ☐
Cardiac Condition ☐
Diabetes ☒
Hearing Impairment ☐
Needs Crutches ☐
Needs Cane/Walker ☐
Needs Wheelchair ☐
Personal Shoes ☐
Pregnant ☐
Seizure Risk-Lower Bunk/Deck ☐
Visual Impairment ☐
Wound Care Supplies ☐
Other ☒
☐

Please Allow Inmate To:
Wedge

Ordered By: Colleen Larsen, RN
Nurse ARNP, MD
2507

When Indicated & Approved by

Sergeant [Signature]

Start Date 7-16-11

End Date: Until Released

Forms Medical Alert Rev 7/99